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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

DEAN FORREST,	)	Case No.
	)	
Plaintiff,	)	COMPLAINT
	)	
vs.	)	
	)	
THUNDERBIRD COLLECTION)	)	
SPECIALISTS, INC.	)	
	)	
Defendant.	)	

**I. INTRODUCTION**

1. This is an action for damages brought by an individual consumer for Defendant's violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (hereinafter "FDCPA"), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices. Plaintiff further alleges a claim for invasion of privacy ancillary to Defendant's collection efforts.

**II. JURISDICTION**

2. Jurisdiction of this Court arises under 15 U.S.C. § 1692k(d).

**III. PARTIES**

3. Plaintiff, Dean Forrest, is a natural person residing in Maricopa County.

4. Plaintiff is a "consumer" as defined by the FDCPA, 15 U.S.C. § 1692a(3).

1           5. Defendant, Thunderbird Collection Specialists, Inc., is a corporation engaged  
2 in the business of collecting debts by use of the mails and telephone, and Defendant  
3 regularly attempts to collect debts alleged to be due another.  
4

5           6. Defendant is a “debt collector” as defined by the FDCPA, 15 U.S.C. §  
6 1692a(6).  
7

#### 8                                   **IV. FACTUAL ALLEGATIONS**

9           7. At various and multiple times prior to the filing of the instant complaint,  
10 including within the one hundred twenty days preceding the filing of this complaint,  
11 Defendant contacted Plaintiff in an attempt to collect an alleged outstanding debt.  
12 Defendant’s conduct violated the FDCPA in multiple ways, including but not limited to:  
13

14               a. Repeatedly causing Plaintiff’s phone to ring with intent to harass, annoy or  
15 abuse (§ 1692d(5));

16               b. Repeatedly communicating with Plaintiff about in connection with the  
17 collection of the debt of a third-party Consumer, including mentioning that the  
18 third party owes a debt (§ 1692c(b) & § 1692b(2)(3)).

19           8. Defendant’s aforementioned violations of the FDCPA also constitute an  
20 invasion of Plaintiff’s right to privacy, causing injury to Plaintiff’s feelings, mental  
21 anguish and distress.  
22

#### 23                                   **IV. PRAYER FOR RELIEF**

24           9. As a result of the above violations of the FDCPA and invasion of privacy,  
25 Plaintiff suffered and continues to suffer injury to Plaintiff’s feelings, personal  
26 humiliation, embarrassment, mental anguish and emotional distress, and Defendant is  
27  
28

1 liable to Plaintiff for Plaintiff's actual damages, statutory damages, and costs and  
2 attorney's fees.

3  
4 WHEREFORE, Plaintiff respectfully prays that judgment be entered against the  
5 Defendant for the following:

- 6 A. Declaratory judgment that Defendant's conduct  
7 violated the FDCPA;  
8 B. Actual damages;  
9 C. Statutory damages pursuant to 15 U.S.C. § 1692k;  
10 D. Costs and reasonable attorney's fees pursuant to  
11 15 U.S.C. § 1692k; and,  
12 E. For such other and further relief as may be just and proper.

13  
14 **PLAINTIFF HEREBY REQUESTS A TRIAL BY JURY**

15 Respectfully submitted this 23rd day of April, 2008

16 By: s/ Marshall Meyers  
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